

ORAL STATEMENT
**Public Comment on the
CASAC Review of EPA's Integrated Review Plan for Ozone
(External Review Draft – October 2018)**

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Good morning. Thank you Aaron.

Greetings to the members of CASAC, and to the EPA staff from NCEA and OAQPS involved in this review.

Since October 2017, several changes to CASAC and the NAAQS review process have been implemented by EPA without input from CASAC and the public. These changes harm the quality, credibility, and integrity of NAAQS science review.

18 of my colleagues and I from the former CASAC Ozone Review Panel, which I chaired from 2012 to 2014, submitted a written statement. This 24 page letter contains 7 major findings and 30 recommendations for CASAC. I also refer you to four attachments, including a 44 page statement by me, and statements by three other colleagues. In 5 minutes, I do not have time to cover this.

Please read carefully this letter and its attachments.

Familiarize yourselves with the statutory mandate for CASAC and for the NAAQS review, and with CASAC's charter.

Recent changes to the membership criteria for CASAC and to the review process itself are inconsistent with the statutory mandate and well established and appropriate precedent.

For example, on July 27, this EPA called for nominations for an ozone review panel. On October 11, with no advance notice, discussion, opportunity for input, or reasonable explanation, this EPA decided not to form an ozone review panel.

There are at least four decades of precedent for augmenting the chartered CASAC with additional experts. I document at least 22 review panels dating back to the late 1970s (see page A-38). This is consistent with CASAC's charter and mandate.

The chartered CASAC does not have the breadth and depth of expertise needed for the ozone review, nor could a group of only seven cover the needed scientific disciplines. In key disciplines, diversity of

perspectives is needed from multiple experts. When comparing the EPA determination memo to the EPA call for nominations for an ozone review panel, this group lacks a nationally recognized epidemiologist, and needs a few. There need to be multiple nationally prominent experts in disciplines such as dosimetry, toxicology, controlled human studies, ecological impacts, climate impacts, and related areas such as exposure assessment. If this group wants to take on the framework for causal determination, then it needs multiple experts in this area, not just one.

You are independent from EPA. CASAC has historically spoken up when it has had concerns with procedure.

Today, you should ask: do we have the necessary expertise to do this review? This is a question asked by panels at the start of a review cycle. Clearly, the answer is no. The logical, professional, and necessary thing to do is to recommend to the Acting Administrator that an ozone review panel be formed as soon as possible.

Other key issues that merit your immediate attention and feedback to EPA include:

- the unreasonable timeline,
- fewer opportunities for meetings and public comment,
- fewer documents, fewer drafts,
- commingling of science and policy by combining the REA and PA, and
- lack of a meaningful plan for appropriately dealing with implementation issues.

CASAC is not required to provide 'closure' on any EPA staff work product unless such product is adequate for its intended purpose.

Individual members of CASAC are not required to agree with EPA, with the chair, or each other.

EPA should reformulate the IRP based on our recommendations, and provide a new IRP for another consultation with a properly constituted CASAC ozone review panel.

I'll be happy to answer questions.

Thank you.